

**For office use only**

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 Representor ID # \_\_\_\_\_ Ack: \_\_\_\_\_  
 Representation# \_\_\_\_\_

# North Dorset Local Plan Part 1

## Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

### Response Form

**For each representation you wish to make a separate response form will need to be completed.**

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at [www.dorsetforyou.com/planning/north-dorset/planning-policy](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at: [www.surveymonkey.com/s/NorthDorsetLocalPlan](http://www.surveymonkey.com/s/NorthDorsetLocalPlan)

**Deadline: 5 pm on 24 January 2014. Representations received after this time may not be accepted.**

### Part A—Personal details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available. By submitting this response form on the pre-submission North Dorset Local Plan Part 1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our website, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details(if applicable)*		Agent's Details(if applicable)*
Title		Mr.
First Name		Peter
Last Name		Atfield
Job Title( <i>where relevant</i> )		Director
Organisation ( <i>where relevant</i> )	Charles Church Developments	Goadsby Planning & Environment
Address	C/O Agent	99 Holdenhurst Road, Bournemouth  Dorset
Postcode		BH8 8DY
Tel. No.		01202 550100
Email Address		peter.atfield@goadsby.com

## Part B– Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representation to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is 'sound'.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258484201.

### 1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)  
 Final Sustainability Appraisal Report (please complete Questions 2 and 10)  
 Habitats Regulations Assessment (please complete Questions 2 and 10)

### 2. Please state the part of that document you are commenting on:

Paragraph number:	Policy 8	Policies map:
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### 3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Co-operate, legal and procedural requirements?

Yes

### 4. Do you consider the Local Plan to be 'sound'?

No

### 5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared  
 It is not justified  
 It is not effective  
 It is not consistent with national policy

**6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound.** Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

In accordance with our representations in respect of Paragraph 5.16, Local Plan Policy 8 introduces a two tiered approach to the provision of affordable housing. Across the district a quota of 40% is set, but this is reduced in the settlement of Gillingham. This is based upon the findings of a background report prepared by 'Three Dragons'. In turn, the Three Dragons report justifies this approach by reference to differing residual land values in the district.

It is submitted that this is not a sound approach to providing affordable housing. The relationship between gross development value and residual land value is generally the same, in percentage terms, irrespective of the location of any given site in the district. Introducing a two tier system therefore discriminates against landowners and developers in perceived higher value areas without necessarily providing the level affordable housing commensurate with need.

The Final Three Dragons Report considered that a target of 30% affordable housing would be a reasonable starting point for the delivery of affordable housing. That approach is endorsed, but should be applied across the district.

Additionally, and in accordance with our representations in respect of Paragraph 5.105, the policy should not set out a preference for social rented housing. Developers should be free to propose affordable rented as part of their development proposals, in addition to intermediate housing.

Finally, the reference to 'pepper potting' implies very small clusters of housing that may not be suitable for effective management by a Registered Social Landlord. Development in small groups would be more appropriate.

**7. What change (s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound?** It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Policy 8 to refer to a single affordable housing target of 30%.  
Omit the preference for social rented housing.  
Replace 'pepper-potting' with 'small groups'.

**8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?**

No, I do not wish to participate in the oral examination

Yes, I would like to participate in the oral examination

**9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary.** Please note that the Inspector determines who is heard at the examination.

To debate the effectiveness of the provision of affordable housing in the context of development viability; and to refine the policy to make it more deliverable.

**10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment.** Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

**11. Do you wish to be notified of any of the following?** Please tick all that apply. We will contact you using the details you have given above.

- That the Local Plan Part 1 has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1

Signature: pp Goadsby Planning & Environment  
If submitting the form electronically, no signature is required

3<sup>rd</sup> January 2014